

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs

VS.

UNITED STATES OF AMERICA, *et al.*,

Defendants,

KARLA PEREZ, *et al.*,

Defendants-Intervenors,



CIVIL ACTION NO. 1:18-cv-00068

UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF OF 114 COMPANIES AND ASSOCIATIONS AS *AMICI CURIAE* IN SUPPORT OF DEFENDANTS-INTERVENORS AND IN OPPOSITION TO PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 7 and Local Rule 7.2, the entities listed in the Appendix to the attached proposed *amicus* brief respectfully move this Court for leave to file the attached brief as *amici curiae* in support of Defendants-Intervenors and in opposition to Plaintiffs' motion for a preliminary injunction in the above-captioned matter. Plaintiffs, Defendants, and Defendants-Intervenors have consented to this motion. *Amici* are 114 U.S.-based companies from every sector of the economy that collectively contribute trillions of dollars in annual revenue to the American economy. They have a significant interest in this case, and their participation will assist the Court in resolving the issues presented.

Plaintiffs seek a preliminary injunction against the Deferred Action for Childhood Arrivals (DACA) program, which deferred deportation of Dreamers—immigrants who arrived in the U.S. when they were children—and allowed them to apply for work authorization. An injunction of DACA would inflict significant harm on American companies such as *amici*: It will disrupt their operations, many of which rely on Dreamers as employees; it will hurt their ability to attract diverse and talented employees, customers, and investment from around the world to boost innovation and growth; it will eliminate customers for and users of their products and services; and it will depress the national economy, as the U.S. loses Dreamers' considerable tax payments, spending, and investments.

The proposed *amicus* brief attached as Exhibit A describes these harms to *amici*'s business operations and the U.S. economy and explains how DACA is consistent with federal law—both of which are relevant to this Court's consideration of plaintiffs' motion for a preliminary injunction. *Amici* provide this Court with the unique perspective of companies representing a large cross-section of the U.S. business community to assist the Court in evaluating the issues in this case, which are of utmost public importance, in a way that is

consistent with the law and that serves the best interests of the business community and the U.S. economy. *See Newark Branch, N.A.A.C.P. v. Harrison*, 940 F.2d 792, 808 (3d Cir. 1991).

For the foregoing reasons, *amici* request that the Court grant their unopposed motion and accept for filing the attached *amicus* brief.

Dated: July 21, 2018

/s/ Kevin Ranlett

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CERTIFICATE OF SERVICE

I hereby certify that, on July 21, 2018, this document was served on all counsel of record via the Court's Electronic Case Filing System.

/s/ Kevin Ranlett
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